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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
SOHAIL MAMDANI,  
  
Defendant.

CASE NO. 1:22-CR-00279-JLT-SKO

STIPULATION REGARDING CONTINUANCE OF  
STATUS CONFERENCE; ORDER

DATE: January 18, 2023

TIME: 1:00 p.m.

COURT: Hon. Sheila K. Oberto

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. On October 27, 2022, the defendant was arraigned before this Court and eventually ordered released.

2. On November 15, 2022, this matter was set for a status hearing before this Court on January 18, 2023 and time was excluded under the Speedy Trial Act until January 18, 2023.

3. By this stipulation, both parties now move to continue the status hearing until April 5, 2023.

4. The parties agree and stipulate, and request that the Court find the following:

a) The parties stipulate that the delay is required to allow the defense reasonable time for preparation and review of discovery, and for the government's continuing investigation of the case. The parties further agree that the interests of justice served by granting this

1 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18  
2 U.S.C. § 3161(h)(7)(A).

3 b) Initial discovery associated with this case has been either produced directly to  
4 counsel and/or made available for inspection and copying. The government has already provided  
5 the defense with a plea offer in this case.

6 c) Counsel for defendant desires additional time to consult with his client, to review  
7 the current charges, to conduct investigation and research related to the charges, and to discuss  
8 the government's proposed resolution with his client.

9 d) Counsel for defendant believes that failure to grant the above-requested  
10 continuance would deny him the reasonable time necessary for effective preparation, taking into  
11 account the exercise of due diligence.

12 e) The government does not object to the continuance.

13 f) The requested date is a mutually agreeable date for both parties.

14 g) The parties agree that good cause exists for the extension of time, and that the  
15 extension of time would not adversely affect the public interest in the prompt disposition of  
16 criminal cases. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §  
17 3161, et seq., within which trial must commence, the time period of January 18, 2023 to April 5,  
18 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161 (h)(1)G), 3161(h)(7)(A),  
19 and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the  
20 parties' request on the basis of the Court's finding that the ends of justice served by taking such  
21 action outweigh the best interest of the public and the defendant in a speedy trial.

22 h) Nothing in this stipulation and order shall preclude a finding that other provisions  
23 of the Speedy Trial Act dictate that additional time periods are excludable from the period within  
24 which a trial must commence.

25  
26 IT IS SO STIPULATED.  
27  
28

1 Dated: January 9, 2023

PHILLIP A. TALBERT  
United States Attorney

2  
3 /s/ ALEXANDRE DEMPSEY  
4 ALEXANDRE DEMPSEY  
Assistant United States Attorney

5 Dated: January 9, 2023

6 /s/ KEVIN ROONEY  
7 KEVIN ROONEY  
Counsel for Defendant  
8 SOHAIL MAMDANI

9 **ORDER**

10 For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within  
11 which trial must commence, the time period of January 18, 2023, through April 5, 2023, inclusive, is  
12 deemed excludable pursuant to 18 U.S.C. §§ 3161 (h)(1)G), 3161(h)(7)(A), and 3161(h)(7)(B)(i) and  
13 (iv). At the request of the parties, the January 18, 2023, status hearing in the above case is  
14 **CONTINUED** until April 5, 2023.

15  
16 IT IS SO ORDERED.

17  
18  
19 DATED: 1/10/2022

*Sheila K. Oberto*  
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THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE